

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Tamara Paradissis**

Debtor(s)

Case No. 17-16197

Chapter **7**

Motion to Avoid Judicial Lien on Personal Property

1. Debtor, **Tamara Paradissis**, commenced this case on **September 12, 2017** by filing a voluntary petition for relief under Chapter 7 Title 11 of the United States Bankruptcy Code.
2. This court has jurisdiction over this motion, filed pursuant to 11 U.S.C. Sec. 522(f) to avoid and cancel a judicial lien held by **Midland Funding LLC** on property held by the debtor.
3. On **October 13, 2016**, creditors recorded a judicial lien against the following debtor's property:

All property of Debtor

The said judicial lien is entered of record as follows:

Bucks County Court of Common Pleas, 2016-06331, in the amount of \$1,736.07

4. All such possessions of debtor(s) have been claimed as fully exempt in their bankruptcy case.
5. The existence of **Midland Funding LLC** lien on debtor's household and personal goods impairs exemptions to which the debtor(s) would be entitled under 11 U.S.C. Sec. 522(b).

WHEREFORE, debtor(s) pray for an order against **Midland Funding LLC** avoiding and canceling the judicial lien in the above-mentioned property, and for such additional or alternative relief as may be just and proper.

Date **January 5, 2018**

Signature **/s/ Tamara Paradissis**

Tamara Paradissis

Debtor